The Honorable John H. Chun 1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 YER YANG MOUA, CASE NO. 2:22-cv-00985-JHC 10 Plaintiff. STIPULATED MOTION AND ORDER FOR EXTENSION OF 11 PRETRIAL DEADLINES v. 12 UNITED STATES OF AMERICA, Noted for Consideration: July 20, 2023 13 Defendant. 14 **JOINT STIPULATION** 15 16 The parties hereby jointly STIPULATE AND AGREE to extend the date for the close of discovery, which was originally set forth in the Court's November 4, 2022, Minute Order Setting 17 18 Trial Date and Related Dates (Dkt. 10), as set forth below. 19 **Proposed New Current Deadline Deadline Deadline** 20 Discovery completed by July 24, 2023 August 22, 2023 21 Good cause exists for extending these specific deadlines. The parties have engaged in 22 significant discovery but need additional time to complete expert witness depositions. 23 Additionally, the parties are attempting to resolve the case during this period. Additional time will 24

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allow the parties to continue to engage in settlement discussions while also allowing for the remaining depositions to occur. This extension will not interfere with other pretrial deadlines. 2 3 For the reasons set forth above, the parties believe that there is good cause to request an extension of the above-listed dates and respectfully request that the Court grant their motion. 4 SO STIPULATED. 5 DATED this 20th day of July, 2023. 6 TESSA M. GORMAN 7 **CMG LAW** Acting United States Attorney 8 s/ Whitney Passmore s/ Tyler Goldberg-Hoss WHITNEY PASSMORE, FL No. 91922 TYLER GOLDBERG-HOSS, WSBA No. 41653 9 Assistant United States Attorney 115 NE 100th Street, Suite 220 United States Attorney's Office Seattle, WA 98125 10 700 Stewart Street, Suite 5220 Phone: 206-443-8600 Seattle, Washington 98101-1271 Fax: 206-443-6904 11 Phone: 206-553-7970 Email: tyler@cmglaw.com Fax: 206-553-4073 12 Email: whitney.passmore@usdoj.gov Attorney for Plaintiff 13 Attorney for United States of America 14 I certify that this memorandum contains 158 words, in compliance with the Local 15 Civil Rules. 16 17 18 19 20 21 22 23 24

**ORDER** 1 It is hereby ORDERED that the parties' motion is GRANTED. The new pretrial 2 deadlines are as follows: 3 4 **Deadlines** 5 Discovery completed by August 22, 2023 6 7 DATED this 21st day of \_\_\_ July 8 In A. Char 9 10 United States District Judge 11 12 13 14 15 16 17 18 19 20 21 22 23 24